

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL AVENATTI

Defendant.

S1 19 Cr. 373 (PGG)

DEFENDANT'S SENTENCING LETTERS

Scott A. Srebnick
SCOTT A. SREBNICK, P.A.
2214 N.W. 1st Place, 2nd Floor
Miami, FL 33127
Telephone: (305) 285-9019
Facsimile: (305) 377-9937
E-Mail: scott@srebnicklaw.com

E. Danya Perry
PERRY GUHA LLP
35 East 62nd Street
New York, New York 10065
Telephone: (212) 399-8340
Facsimile: (212) 399-8331
E-mail: dperry@perryguha.com

July 2, 2021

Dear Judge Gardephe:

I am writing to you as the ex-wife, co-parent of our 2 children, and a forever family member of Michael Avenatti. The last few years have been traumatic, as I have watched who Michael Avenatti is... be condensed into a short, tragic story that is unrecognizable, versus the complete and complex novel that deserves to be told. My hope is that in sharing some of our story, you will have a more thorough understanding of the whole book, and not just a chapter.

In March of 1992, I met a young man on a financial hardship leave from University of Pennsylvania as a result of his father's forced retirement. Michael grew up in middle America with a stay-at-home mom, and a dad who worked for corporate America. After four states and more than 25 years of service, suddenly, his father was dealt an early retirement package. This news rocked the family, but would clarify Michael's career path. Michael knew he wanted to go to law school to champion for the little guy. In order to save money to continue his academic studies, Michael worked on political campaigns and lived in a room of a campaign manager's home in Philadelphia.

In the first months of our relationship, my mother was diagnosed with a terminal heart condition. Michael was an invaluable asset to my family and helped to secure the care she needed. I gave up my apartment, and Michael and I moved in my parent's home to care for her. In order to complete his degree, with the ultimate plan of attending law school, we formulated a plan to marry in 1994 and work multiple jobs while living with my parents. Through our hard work, and his exceptional academic record, Michael was able to start law school at George Washington University in Washington D.C. My red, stick shift VW Jetta with manual windows and I worked tirelessly over the next years to assist Michael, as he worked full-time and attended evening classes to earn his degree. These years were filled with challenges, as we endured financial stresses (Popeye's, after church, was our splurge of the week, using a buy-one-get-one coupon), illnesses, surgeries and the untimely and tragic deaths of several close family members, including my mother and grandmother. Despite these challenges, in May 2000, Michael attended his law school graduation and we permanently relocated to the West Coast to start his career. He landed at a large law firm and I worked as a litigation claims adjuster for an insurance company.

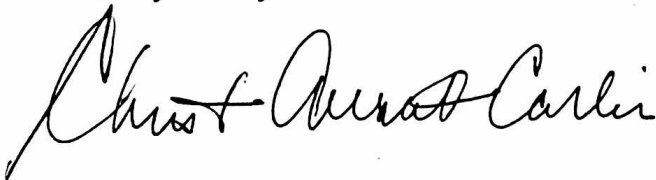
We rented an apartment near the firm and started our family, welcoming our first daughter, [REDACTED] in 2002. Shortly after our daughter's birth, Michael left the large law firm and went to work for a boutique litigation firm, where he achieved great successes for the firm's clients. In 2004, we welcomed our second child, [REDACTED], but the stresses of extremely long workdays coupled with business travel (both domestic and international) and long deposition schedules and trials throughout the country started to crack our foundation.

Ultimately, we separated in 2006 and divorced in 2007. As with any relationship, married or divorced, we had disagreements (often large disagreements), yet we were always able to put the needs of our children ahead of ourselves and co-parent amicably. My current husband, Michael and I have been able to sit at funerals, weddings and school functions together as a cohesive family unit and provide stability and support to our children. Together we have raised two beautiful, educated, hardworking, caring and compassionate daughters. Our daughter [REDACTED] in particular, has been inspired since childhood to help others and plans to go into a career of service as a teacher or occupational therapist.

I share this background with you in hopes that you will see a bit of the Michael Avenatti I know-- the Michael who worked full-time to educate himself after a family hardship. The Michael who overcame challenge after challenge in his life. The Michael who faced a very traumatic childhood and channeled it into his work ethic. The Michael who tirelessly worked to achieve success for his clients. The Michael who loves his parents. The Michael who adored his Grams, cared for her during her final years and was with her when she took her final breath. The Michael who over the years helped my family and friends too many times to count. The Michael who helped bury my mother and then helped my sister get married in our darkest of times. The Michael who checked in daily as I was battling cancer and cried out of fear that our girls would lose me. The Michael who loves his daughters and has always made sure they know that and value themselves and others.

My sincere hope is that you will take into account the full and complete story of Michael Avenatti while evaluating his sentence.

Thank you for your time and consideration -

A handwritten signature in black ink, reading "Christine Avenatti-Carlin". The signature is fluid and cursive, with the first name "Christine" being more prominent and the last name "Avenatti-Carlin" following in a similar style.

Christine Avenatti-Carlin

June 30, 2021

Honorable Judge Gardephe,

I am writing to share some of my personal experiences with Michael Avenatti. I have known Michael for almost thirty years. I knew Michael as a college student at the University of Pennsylvania, a law student at George Washington University, a husband to my sister, my brother-in-law and a father to my intelligent, beautiful nieces. I knew Michael well before the media did. I believe that I know the real Michael Avenatti.

Back in 1992, my mother was diagnosed with a serious heart condition. Over the years that followed, my sister, Christine, and Michael were a part of the circle that surrounded my mother. This circle gave her the love and support needed to live another seven years. Michael and Christine even moved into our family home to be closer to her. As a family, we supported each other through all of life's challenges. My parents and sister worked hard to support Michael through law school. They knew that Michael wanted to make a difference in this world so sacrifices were made to help make his dream come true. While Michael was still attending law school, my mother passed away in June of 1999. Michael offered financial assistance to help give my mother the funeral that she deserved. After burying my mother, I decided to change my wedding plans for the following November. It was too emotional planning a wedding without my mother. It was then that Michael offered to pay for my husband and I to travel to Hawaii for a small, beach wedding. Not only did Michael pay for our trip, but he served as our official wedding photographer. It was a special trip with beautiful memories. I will always be grateful for these acts of kindness and selflessness.

The media has portrayed Michael to be someone different than the man that I have known for decades. The man that will be sitting before you has provided for his ex-wife and children, loved his family and made a difference in countless lives. I am asking you to please take this information into consideration when deciding upon Michael's future.

Sincerely,

A handwritten signature in black ink that reads "Michelle R. Greene". The script is fluid and cursive, with the first letters of each word being capitalized and prominent.

Michelle R. Greene